
From: Meyer, Susan A SPL
To: Miyamoto, Faith
CC: Spurgeon, Lawrence; Zaref, Amy; Van Epps, James; Kasperowicz, Lindsey POH; Young, George P POH
Sent: 9/9/2009 3:14:53 PM
Subject: RE: Honolulu High-Capacity Transit Corridor Project

Faith,

I thought it important to bring to your attention some inconsistencies the Corps found with various sections of your pre-FEIS. These inconsistencies are troubling in that they appear contrary to what we discussed during our August 10th meeting with Parsons Brinckerhoff.

The Corps was told in no uncertain terms that there would be no impacts to waters of the U.S. beyond those directly associated with the guideway itself (i.e., support columns/piers). According to new tables included in the pre-FEIS, the direct loss of water of the U.S. associated with the guideway is 0.2-acre. However, pages 4-138, 4-163 and 4-190 indicate there are other project feature impacts, albeit minor in scale, that will also adversely impact waters of the U.S. and require DA authorization. These impacts are 0.02-acre, 0.45-acre and 0.06-acre, respectively. Due to the inconsistencies in acreages, we cannot discern the actual estimated impacts for each non-linear transportation feature mentioned in your pre-FEIS (i.e., park-and-rides and stormwater outfall). Also, Table 4-37 on page 4-190 shows a 1.25-acre impact to Kaloi Gulch (non-jurisdictional waterway) associated with a park-and-ride facility, which we presume is separate from the 0.45-acre impact to the park-and-ride structure referenced on page 4-138.

Most alarming is page 4-138 indicates: "another 0.45-acre of impact will result from the construction of a park-and-ride and the extension of a stormwater outfall in waters of the U.S.". During our meeting on August 10th we were told only the guideway would impact waters of the U.S. Park-and-ride structures are not covered under the terms of NWP 14 and may not be covered under other NWPs due to our Honolulu District Regional Conditions, thereby necessitating review under our Standard Individual Permit procedures. Should there be other non-linear transportation features, like parking lots, outfall structures, maintenance yards, etc. that cannot avoid impacting waters of the U.S., then so be it. But, we need to have a clear understanding of the scope of these impacts, as the scope and intensity of impacts play an integral role in determining the permit type and timeline, as well as appropriate mitigation. We strongly encourage a comprehensive QA/QC review of this document to reconcile the inconsistencies and discrepancies we've found.

Thanks in advance for your attention to this matter. As always, please feel free to give me a call if you or others would like to discuss.

Sincerely,
Susan

-----Original Message-----

From: Meyer, Susan A SPL
Sent: Thursday, August 27, 2009 3:06 PM
To: 'Miyamoto, Faith'; Young, George P POH
Cc: 'Spurgeon, Lawrence'; 'Zaref, Amy'; 'Judy Aranda'; 'baizas@infraconsultllc.com'
Subject: RE: Honolulu High-Capacity Transit Corridor Project

Faith,

We received your package containing the revised FEIS chapters and summary matrix of response to USACE comments. We will review the documents as soon as possible and get back to you regarding the need to set up one or more site visits.

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Thank you,
Susan

Susan A. Meyer
Biologist, Sr. Project Manager
U.S. Army Corps of Engineers, Regulatory Division/Branch CESPL-RG/CEPOH-EC-R
Bldg. 230 (Bldg. T214) Ft. Shafter, Hawaii 96858-5440
Tel: 808.438.2137; Fax: 808.438.4060
susan.a.meyer@usace.army.mil
<http://www.poh.usace.army.mil/EC-R/EC-R.htm> (USACE, Honolulu District)
<http://www.spl.usace.army.mil/regulatory> (USACE, Los Angeles District)
<http://www.usace.army.mil/CECW/Pages/Home.aspx> (USACE, Headquarter's)

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Integrity * Personal Courage

-----Original Message-----

From: Miyamoto, Faith [mailto:fmiyamoto@honolulu.gov]
Sent: Wednesday, August 26, 2009 5:26 PM
To: Young, George P POH; Meyer, Susan A SPL
Cc: Spurgeon, Lawrence; Zaref, Amy; Judy Aranda; baizas@infraconsultllc.com
Subject: Honolulu High-Capacity Transit Corridor Project

Aloha George and Susan,

Thank you for providing the City with comments on the Administrative Final EIS, dated June 18, 2009, and meeting with us on August 10, 2009. We have reviewed and considered your comments and have made changes in the Final EIS accordingly. The attached matrix provides responses to your comments so that you can see how they were addressed in the Final EIS. We are also sending copies of these materials to your office.

As you requested we are providing pre-decisional review copies of portions of the Final EIS where we made more substantive edits to address your comments. Copies of the following sections are available at the FTP site link below: Chapter 2 - Alternatives Considered and portions of Chapter 4 - Environmental Analysis, Consequences and Mitigation including Section 4.14 - Water and Section 4.18.10 Construction Phase Effects Water Resources. New text is shown in blue.

<https://ftp.pbworld.com/GetFile.aspx?fn=1803441842.zip>
<<https://ftp.pbworld.com/GetFile.aspx?fn=1803441842.zip>>

In an effort to work collaboratively with the Honolulu District Regulatory Branch office to complete the Final EIS for public release we would like to take a few hours to "workshop" the Final EIS and incorporate any additional comments and edits you may have. It is the City's intent to publish a Final EIS that meet's your agency's needs and proposes this as an approach to accomplish that goal and meet our schedule. Please contact Amy Zaref at 801.201.2670 or zaref@pbworld.com if you have any questions.

We are also available to escort you on a field review of resources. If you

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would let us know what locations you would like to review, and what dates and times you are available, we will contact property owners and inform them that the U.S. Army Corps of Engineers will be on-site.

Thanks for your help.

Faith Miyamoto

Department of Transportation Services

City and County of Honolulu

Phone: (808) 768-8350

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